

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 19-CR-00076-GWC
	)	
	)	
WILLIAM KELLY,	)	
	)	
Defendant.	)	
	)	

**WILLIAM KELLY’S MOTION FOR LEAVE TO FILE SENTENCING  
MEMORANDUM EXCEEDING 15 PAGES**

Now comes the Defendant, William Kelly, by and through undersigned counsel, pursuant to Local Rule 7(a)(4), and hereby seeks leave of Court to file a sentencing memorandum exceeding 15 pages in length. As grounds and reasons therefore, Mr. Kelly’s sentencing memorandum contains a lengthy section on his personal background, a section on applicable legal principles, and a section as to an appropriate sentence in this matter. Based on the current draft, Mr. Kelly estimates the memorandum will not exceed thirty-five pages in length. Sentencing in this matter is obviously of immense importance to Mr. Kelly and he merely seeks to provide the Court with appropriate context for the sentencing decision in this matter so the Court is able to make the most informed decision possible. As such, Mr. Kelly seeks leave of Court to file a sentencing memorandum of thirty-five pages or less.

Respectfully Submitted,  
WILLIAM KELLY,  
By His Attorney,

**/s/ Robert M. Goldstein**  
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Dated: April 6, 2022

**Certificate of Service**

I, Robert M. Goldstein, hereby state that on this date, April 6, 2022, a true copy of the foregoing document has been served, via electronic mail, on Assistant U.S. Attorney Paul Van de Graaf and First Assistant U.S. Attorney Nicole Cate.

**/s/ Robert M. Goldstein**  
Robert M. Goldstein